

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs.

Respectfully:

/s/ Barbara Binis

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*Attorney for Plaintiffs on Exhibit A*

Dated: August 8, 2018

**EXHIBIT A – WAGSTAFF & CARTMELL**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:15-CV-14681	Althea Aponte, Felipe Aponte v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-CV-16407	Constance Carney v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis

Barbara R. Binis